

# Cumbria District Data Protection Bulletin 3

## Getting started: Data Mapping

I hope that by now your church has recognised that every church holds some personal data – see Bulletin 2 on this link: <https://www.cumbriamethodistdistrict.org.uk/resources/gdpr.html>.

If you have a circuit role, please read ‘circuit’ as well as ‘church’, every time I mention ‘church’ in this bulletin.

Now it’s time to get started, if you haven’t already. Perhaps the first step is to identify someone in the church who can be the church Data Champion, or at least be willing to be the contact for personal data issues in your church. If your church doesn’t have such a person identified, I suggest that the stewards get together to identify such a person, preferably someone who is reasonably organised, and can get others to deal with ‘boring data protection’. Alternatively, the stewards could be jointly responsible for GDPR? While formally the Managing Trustees are responsible, I can’t envisage a whole Church Council filling in a form together! By the way, whilst it would be good to get the Church Council to confirm the role, you can get started straight away, provided that the church leadership is agreed.

The first thing for the nominated person(s) to do is to find out who in your church holds what personal data. To help with this, there is a standard Data Mapping Form, available on this link: <https://www.tmcp.org.uk/about/data-protection/resources/standard-documents-and-forms/data-mapping-form>. The form looks like this (I know it’s small writing, but you don’t need to read it all):

Document/list description	For what purpose is the data held?	What data is collected?	Do you have explicit consent to use the data?	Do you process any Special Categories of personal Data?	How is the data held and what security measures are in place?	Who holds the data and who has access to it?	How long is the data kept for?	How is the data destroyed?	Is any data kept by or circulated to persons outside of the Methodist Church including any Ecumenical partners?
Example: Church Directory <sup>1</sup>	To provide a list of church members and office holders	Names, addresses, email addresses, telephone numbers	Yes <sup>2</sup>	No <sup>3</sup>	Data Collection consent form (locked filing cabinet) and Church administrator’s Laptop (password protected)	Minister, Church Administrator, Circuit Administrator, District Administrator	Until asked to remove	Paper shredder and electronic deletion from laptop	Yes, it is published on our website and freely available from the church

At first sight, the form looks a little overwhelming, but I’ve highlighted ‘Who holds the data’ above, because I think this is the key to getting a decent completed Data Mapping Form: you should contact all the officers in your church and ask them to complete a table row, or rows, for the personal data they hold.

It may be the case when you fill in the form that certain gaps are identified. For example, you might wonder whether you need consent for some personal data, but if you don’t have consent, the best answer for now is ‘No’. Remember that you may not need consent, for example if you can rely on ‘legitimate interest’ (probably the subject for a later bulletin). Let’s focus just now on actually finding out what personal data is held in your church. Remember that even just your name is personal data.

I know this seems somewhat bureaucratic, but we do all this not only because we have to meet legal requirements, but also because we care about people and their personal data. In reality, **if we don’t know who holds what personal data, how can we claim to be in control of personal data in our church?**

If you have any views on this bulletin, or have any queries about data protection, please do get in touch with me, and I’ll see what I can do. The answer may well be on <https://www.tmcp.org.uk/about/data-protection>.

**Alec Bounds,**  
**Cumbria District Data Champion,**  
boundsalec@gmail.com

